

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JAMES EVERETT SHELTON,

Plaintiffs,

v.

DIRECT ENERGY, LP, AND KAA
ENERGY, INC.,

Defendant.

Case No. 2:20-cv-03966-CMR

**DEFENDANT DIRECT ENERGY, LP'S RESPONSE TO PLAINTIFF'S
MOTION FOR ALTERNATIVE SERVICE AND FOR EXTENSION OF TIME TO
SERVE SUMMONS AND COMPLAINT UPON DEFENDANT KAA ENERGY, INC.**

Defendant Direct Energy, LP (“Direct Energy”) files this response to Plaintiff James Everett Shelton’s Motion for Alternative Service and for Extension of Time to Serve Summons and Complaint Upon Defendant KAA Energy, INC. (Dkt. 14, the “Motion”), and respectfully shows the Court as follows:

1. On November 18, 2020, Mr. Shelton filed his Motion asking this Court for both an extension of time to serve KAA Energy and to serve via alternative means.
2. Direct Energy does not oppose Mr. Shelton’s Motion.

Dated: December 1, 2020

By: /s/ William B. Thomas

Steven M. Lucks, Esq.

FISHKIN LUCKS LLP

1601 Market Street, 19th Floor

Philadelphia, PA 19103

(215) 607-2500 (Telephone)

(973) 679-4435 (Facsimile)

slucks@fishkinlucks.com

-and-

McDOWELL HETHERINGTON LLP
Michael D. Matthews, Jr.*
Texas Bar No. 24051009
William B. Thomas*
Texas Bar No. 24083965
1001 Fannin Street, Suite 2700
Houston, Texas 77002
T: (713) 337-5580
F: (713) 337-8850
matt.matthews@mhllp.com
william.thomas@mhllp.com

**pro hac vice applications to be filed*

Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served on the 1st Day of December, 2020 via CM/ECF on all counsel of record.

/s/ William B. Thomas
William B. Thomas
Attorney for Direct Energy, LP